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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

JAMES M. KINDER, Plaintiff, vs. HARRAH'S ENTERTAINMENT, INC. and DOES 1 through 100, inclusive, Defendants.	CASE NO. 07 CV 2226 H (RBB) Judge: Hon. Marilyn L. Huff Mag. Judge: Hon. Ruben B. Brooks DECLARATION OF MARIA C. ROBERTS IN SUPPORT OF *SPECIALLY APPEARING* DEFENDANT'S MOTION TO DISMISS PURSUANT TO F.R.CIV.P. RULE 12(b)(2), (6) ACCOMPANYING DOCUMENTS: NOTICE OF MOTION AND MOTION; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF MICHAEL E. KOSTRINSKY; NOTICE OF LODGMENT OF EXHIBITS; [PROPOSED] ORDER Date: January 7, 2008 Time: 10:30 a.m. Courtroom: 13

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I, Maria C. Roberts, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney with Shea Stokes, ALC, attorneys of record for *Specially Appearing* Defendant Harrah's Entertainment, Inc. If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief.

2. This declaration is submitted in support of *Specially Appearing* Defendant's Motion to Dismiss Pursuant to F.R.CIV.P. Rule 12(b)(2), (6).

3. On November 21, 2007, *Specially Appearing* Defendant effected a timely and proper removal of the action to the United States District Court for the Southern District of California.

4. Attached to the Notice of Lodgment of Exhibits at Exhibit 1 is a true and correct copy of the Summons and Complaint for Damages, including Punitive Damages, Interest and Attorney's Fees, and for Injunctive Relief, filed by Plaintiff James M. Kinder on October 2, 2007.

5. Attached to the Notice of Lodgment of Exhibits as Exhibit 2 is a true and correct copy of the Vexatious Litigant List prepared and maintained by the Administrative Office of the Court, dated September 28, 2007.

6. Attached to the Notice of Lodgment of Exhibits as Exhibit 3 is a true and correct copy of the Declaration of James M. Kinder in Support of Filing by Vexatious Litigant, dated May 9, 2007.

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7. Attached to the Notice of Lodgment of Exhibits as Exhibit 4 is a true and correct copy of the docket for San Diego County Superior Court Case No. 37-2007-00076114-CU-MC-CTL.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed by me on November 30, 2007 at San Diego, California.

/s/Maria C. Roberts
Maria C. Roberts